

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
EASTERN DISTRICT-WI  
FILED

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARQUIS TOWNSEND and  
SILENA WASHINGTON,

Defendants.

2020 FEB 11 P 2:30

CLERK OF COURT

20-CR-032

Case No. 20-Cr-

[21 U.S.C. §§ 841(a)(1) & (b)(1)(C); 18

U.S.C. §§ 922(g)(1), 924(a)(2) &

924(c)(1)(A)(i)]

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about January 28, 2020, in the State and Eastern District of Wisconsin,

**MARQUIS TOWNSEND and  
SILENA WASHINGTON**

knowingly and intentionally possessed with intent to distribute marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about January 28, 2020, in the State and Eastern District of Wisconsin,

**MARQUIS TOWNSEND and  
SILENA WASHINGTON**

knowingly possessed four firearms in furtherance of the drug trafficking charge set forth in Count One.

2. The firearms are more fully described as:
- a. a Smith and Wesson .380 caliber pistol bearing Serial Number KDF2752;
  - b. a Glock 22 .40 caliber pistol bearing Serial Number SZA888;
  - c. a Kimber Ultra Carry II .45 caliber pistol bearing Serial Number KU157706; and
  - d. a Glock 27 .40 caliber pistol bearing Serial Number UYX840.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about January 28, 2020, in the State and Eastern District of Wisconsin,

**MARQUIS TOWNSEND,**

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed four firearms which, prior to his possession of them, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

1. The firearms are more fully described as:

- a. a Smith and Wesson .380 caliber pistol bearing Serial Number KDF2752;
- b. a Glock 22 .40 caliber pistol bearing Serial Number SZA888;
- c. a Kimber Ultra Carry II .45 caliber pistol bearing Serial Number KU157706; and
- d. a Glock 27 .40 caliber pistol bearing Serial Number UYX840.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

## FORFEITURE NOTICE

1. Upon conviction of the controlled substance offense alleged in Count One of this Indictment, the defendant shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense. The properties subject to forfeiture include, but are not limited to, a sum of money representing the amount of proceeds obtained as a result of the offense charged in Count One of this Indictment.

2. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 922(g)(1) and 924(c) set forth in Counts Two and Three of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the knowing violation of Section 922(g)(1) and 924(c), including, but not limited to: a Smith and Wesson .380 caliber pistol bearing Serial Number KDF2752; a Glock 22 .40 caliber pistol bearing Serial Number SZA888; a Kimber Ultra Carry II .45 caliber pistol bearing Serial Number KU157706; and a Glock 27 .40 caliber pistol bearing Serial Number UYX840.

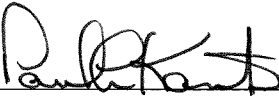
3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL

FOREPERSON

Date:

2-11-2020

  
MATTHEW D. KRUEGER  
United States Attorney